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**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**UNITED STATES OF AMERICA,**

**Case No. 3:14-CR-00275-JO**

**v.**

**MARK DOUGLAS GILL,**

**GOVERNMENT'S  
EXPERT WITNESS LIST  
& SUMMARIES**

**Defendant.**

The United States of America, by and through S. Amanda Marshall, United States Attorney for the District of Oregon, and Leah K. Bolstad, Assistant United States Attorney, hereby provides notice that it intends to call the following witnesses as experts at trial in its case-in-chief:

1. Sergeant Jan Kubic, Multnomah County Sheriff's Office (MCSO)
2. Gary Gebhardt, Oregon State Police Crime Lab, Forensic Scientist

First, the government will call Sergeant Jan Kubic to testify at trial as an expert on drug pricing and quantities (personal use versus distribution amounts). Sergeant Kubic graduated from Reed College with a Bachelor of Arts degree in political science in 1985. He spent nine years as

a pilot prior to being hired by the Multnomah County Sheriff's Office (MCSO) in 1994. During his twenty (20) years with MCSO, Sergeant Kubic has worked three years as a uniformed deputy, and spent six years as a deputy with the MCSO Special Investigations Unit (SIU). He was promoted to the rank of Sergeant in 2004. As a sergeant, he has overseen the Detective Unit (3 years), the Regional Organized Crime and Narcotics (ROCN) Task Force (3 years), and the Special Investigations Unit (5 years). The majority of his law enforcement career has focused on drug investigations.

Sergeant Kubic has over 1,000 hours of certified training hours from the Oregon Department of Public Safety Standards and Training (DPSST) and variety of certified drug investigation training classes in the following areas; criminal investigations, acquisition and preservation of evidence, drug identification and apprehension of drug violators, commercial and passenger vehicle drug interdiction and narcotics investigations. He has completed the Basic and Advanced Training academies, DPSST training in the area of narcotics recognition and identification. He has attended trainings focused on drug investigations, including the DEA-sponsored Basic Drug Investigations, Surveillance Techniques, and Interdiction Training. Sergeant Kubic is currently assigned to oversee the Multnomah County Sheriff's Office Special Investigations Unit.

Sergeant Kubic's primary duties as a sergeant involve supervising law enforcement squads investigating violations of state and federal laws concerning the unlawful distribution of controlled substances, and possession with intent to distribute controlled substances, including cocaine, methamphetamine, marijuana, and heroin. In his 20 years as a law enforcement officer, he has been involved in thousands of narcotic-related cases. He will testify based on his training

and experience investigating thousands of drug offenses and speaking with hundreds of suspects involved in drug-dealing. His testimony will cover comparisons between drug users and drug dealers, including the kinds of quantities he would expect them to purchase/sell/have on hand/use, currency he would expect them to possess, paraphernalia he would expect them to use/have, how dealers package, cut and weigh drugs, descriptions of the prices and street value for different quantities of heroin, and efforts to thwart detection by law enforcement. He is familiar with how methamphetamine is manufactured, packaged and sold in the Portland area. He will testify as to meanings of words and phrases commonly used in drug distribution deals, including: 8 ball (an eighth of ounce), QP (quarter pound), piece (one piece refers to one ounce, or 25-28 grams), zip (slang term for one ounce), and “hook up” (refers to arranging or completing a deal). Sergeant Kubic will testify about the value of the drugs seized from defendant’s house as well as defendant’s admissions of quantities and cell phone evidence of drug distribution quantities, and he will testify that, based on his training and experience, such quantities are more consistent with drug dealing/distribution or trafficking, and not personal use.

Second, the government intends to call forensic scientist Gary A. Gebhardt to testify at trial regarding his laboratory analyses of the evidence seized in this case. Mr. Gebhardt received a Bachelor of Science degree from Oregon State University in 1993, and has been working as a Forensic Scientist for OSP since 2005. Previously Mr. Gebhardt was a laboratory technician for OSP. Since becoming a forensic scientist in 2005, Mr. Gebhardt has undergone over 200 hours of training in Analysis and Identification of Controlled Substances, over 40 hours of Methamphetamine Quantification training, 14 hours of Forensic Chemistry In-Service, and 26 hours of a course in Infrared Analysis of Controlled Substances. The government expects his

testimony to cover the laboratory testing he performed on the controlled substances seized from defendant's residence, and his findings which confirm the presence of over 35 grams of actual (pure) methamphetamine, as listed on his Analytical Report dated July 7, 2014.

DATED this 12<sup>th</sup> day of November 2014.

Respectfully submitted,

S. AMANDA MARSHALL  
United States Attorney

/s/ Leah K. Bolstad  
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